

Honorable Michelle Peterson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

vs.

LIONEL GONZALEZ-TORRES,
Defendants.

Case No. MJ 20-560-2

RESPONSE TO MOTION FOR
DETENTION

*Hearing Date: September 9, 2020
@ 11:00am*

Defendant Gonzalez-Torres hereby responds to the Government's Motion for Detention, and requests that this Court order his pre-trial release upon conditions it deems appropriate.

Defendant Gonzalez-Torres is a 24-year-old, U.S. citizen, with no prior arrests, charges or convictions. He was born, and primarily raised in Washington.

Mr. Gonzalez-Torres has lived in the same apartment for the last two years; and he is in frequent contact with his brothers: Edgar Gonzalez-Torres, who also lives in Western Washington; and Ernesto Gonzalez-Torres, who is serving our country in the U.S. Marines.

Although Mr. Gonzalez-Torres' parents live in Mexico, he has not visited them in over six years. His passport expired years ago and is lost.

Mr. Gonzalez-Torres admits to some excessive drinking as well as recreational drug usage. He is willing to participate in whatever evaluation, testing and/or treatment that this Court might deem appropriate.

For the reasons stated above, we request that this Court authorize the pre-trial release of Defendant Gonzalez-Torres on conditions it deems appropriate.

RESPECTFULLY SUBMITTED this 8th day of September, 2020,

s/ Scott J. Engelhard
 Scott J. Engelhard
 WSBA #13963
 Attorney for Defendant

CERTIFICATION OF SERVICE

I hereby certify that on the date provided below, I filed the foregoing with the Clerk of the Court and the Plaintiff using the CM/ECF system.

Respectfully submitted this 8th day of September, 2020,

s/ Scott J. Engelhard

Scott J. Engelhard, WSBA #13963
Attorney for Defendant